

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service, 1998)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: PAUL G. SECKAR
(OCA/USPS-T2-1-3)
(July 24, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

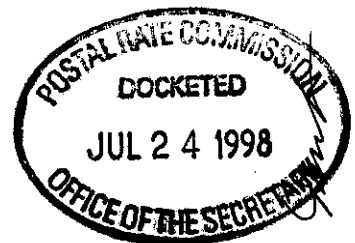
Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-T2-1. Please refer to USPS-T-2, Exhibit A, Table 10.

- a. At lines (6), (20) and (30), please show the derivation of the "Rent per Square Foot" of \$6.
- b. At lines (6), (20) and (30), please explain the assumption of a constant "Rent per Square Foot" of \$6 during the period 1999 to 2003.
- c. At lines (10), (22) and (34), please identify the utilities that constitute the "Utilities Cost per Square Foot."
- d. At lines (10), (22) and (34), please show the derivation of the "Utilities Cost per Square Foot" of \$2.25.
- e. At lines (10), (22) and (34), please explain the assumption of a constant "Utilities Cost per Square Foot" of \$2.25 during the period 1999 to 2003.

OCA/USPS-T2-2. Please refer to USPS-T-2, Exhibit A, Table 10.

- a. At lines (3) and (18), please confirm that the DocuTech 6180 and the DocuTech 4890 printers are assumed to require the same square footage. If you do not confirm, please explain.
- b. Please explain the rationale for using the same square footage for two different printers.

OCA/USPS-T2-3. Please refer to USPS-T-2, Exhibit A, Table 9.


- a. At line (5), for the years 2001, 2002 and 2003, please confirm that the number of DocuTech 6180 printers per site could be greater than 4.68, 6.56 and 7.64,

assuming the number of commercial printing sites is less than 25. If you do not confirm, please explain.

- b. At line (5), for the years 2001, 2002 and 2003, please confirm that the number of DocuTech 6180 printers per site could be greater than 4.68, 6.56 and 7.64, depending upon the actual demand for Mailing Online volume at a commercial printing site. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
July 24, 1998